

GEOFFREY A. HANSEN
Acting Federal Public Defender
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Counsel for Defendant GOMEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR-11-00955 LHK
)	
Plaintiff,)	DECLARATION OF COUNSEL IN
)	SUPPORT OF DEFENDANT'S
vs.)	UNOPPOSED <i>EX PARTE</i> APPLICATION
)	FOR AUTHORIZATION TO RESIDE IN
LINDA GOMEZ,)	THE DISTRICT OF ARIZONA
)	
Defendant.)	The Honorable Paul S. Grewal
_____)	

I, Cynthia C. Lie, hereby declare:

1. I am the Assistant Federal Public Defender currently assigned to represent defendant Linda Gomez.

2. On January 10, 2012, Ms. Gomez made her initial appearance before this Court on a summons. She was thereafter released on a \$20,000 personal recognizance bond, secured by her own signature. The Court imposed no restriction on Ms. Gomez' travel or her ability to change her residence.

3. Ms. Gomez has since appeared as required for two status hearings before the District Court. Her next scheduled appearance of July 25, 2012, has been vacated, due to a pending reassignment of the matter to a different district judge. I am informed and believe that she is in compliance with her conditions of supervision.

4. I am informed and believe that, due to financial and family considerations, Ms. Gomez and her husband intend to relocate from their current residence in Sunnyvale, California, to a retirement community in Chandler, Arizona.

5. On Thursday, July 12, 2012, Supervising United States Pretrial Services Officer Jaime Carranza informed me that court authorization for the planned move is needed in order for Pretrial Services to arrange courtesy supervision of Ms. Gomez by their office in the District of Arizona. Mr. Carranza indicated that he had no opposition to the move.

6. On Thursday, July 12, 2012, I informed Assistant United States Attorney Joseph Fazioli of the planned move. Mr. Fazioli declined to take a position on behalf of the government without further investigation.

7. On Monday, July 16, 2012, Mr. Fazioli responded that the government would not oppose the planned move, provided that the defense not use Ms. Gomez' move as a pretext for delaying the proceedings. I informed Mr. Fazioli on July 16, 2012, that the defense had no such pretextual intentions. Mr. Fazioli confirmed on July 17, 2012, that the government was not opposed to the proposed move.

I declare under penalty of perjury that the foregoing is true and correct and of my personal knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true.

Executed this 17th day of July 2012, in San Jose, California.

s/ _____
CYNTHIA C. LIE
Assistant Federal Public Defender